

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Public Notice)	
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)	
Common Carrier Bureau Seeks Comment on)	NSD File No. L-99-64
the Public Service Commission of Wisconsin's)	
Petition for Delegation of Additional Authority)	
to Implement Number Conservation Measures)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions of the Telecommunications Act of 1996)	

**COMMENTS OF THE PERSONAL
COMMUNICATIONS INDUSTRY ASSOCIATION**

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**COMMENTS OF THE PERSONAL
COMMUNICATIONS INDUSTRY ASSOCIATION**

The Personal Communications Industry Association ("PCIA"),¹ hereby respectfully submits its comments on the *Public Notice* released by the Federal Communications Commission ("FCC" or "Commission") in the above-captioned proceeding.²

¹ PCIA is an international trade association established to represent the interests of the commercial and private mobile radio service communications industries and the fixed broadband wireless industry. PCIA's Federation of Councils includes: the Paging and Messaging Alliance, the PCS Alliance, the Site Owners and Managers Association, the Private Systems Users Alliance, the Mobile Wireless Communications Alliance, and the Wireless Broadband Alliance. As an FCC-appointed frequency coordinator for the Industrial/Business Pool frequencies below 512 MHz, the 800 MHz and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies, PCIA represents and serves the interests of tens of thousand of FCC licensees.

² Public Notice, *Common Carrier Bureau Seeks Comment on the Public Service Commission of Wisconsin's Petition for Delegation of Additional Authority to Implement Number Conservation Measures*, NSD File No. L-99-64, DA 99-1606 (released August 12, 1999).

I. INTRODUCTION AND SUMMARY

PCIA has consistently supported a strong federal role in supervising a unified, nationwide numbering system that ensures that all carriers are provided with an adequate supply of telephone numbers and has a significant interest in the captioned request.

The petition of the Public Service Commission of Wisconsin (“Wisconsin”) seeks grant of additional authority from the Commission to: (1) enforce current, or to set and enforce new, standards for number allocation; (2) order efficient number use practices within NXX codes; (3) order the return of unused and reserved NXX codes (and thousand blocks if number pooling is implemented); (4) order number utilization and forecast reporting, including authority to audit such reports; (5) investigate and order unassigned number porting; (6) investigate and order additional rationing measures; and (7) implement mandatory thousands block number pooling.

While PCIA will herein address the merits of each of Wisconsin’s requested grants of additional authority, PCIA urges the Commission to recognize that grant of any or all of the requested relief could ultimately hinder, rather than help, efforts to promote efficient and effective number assignment and conservation policies and procedures on a *nationwide* basis. Indeed, the breadth of authority sought by Wisconsin, as well as the level of detail on numbering matters over which the State seeks control, essentially turns this request into one seeking domain over all major aspects of number policy and management within Wisconsin. PCIA urges the Commission to decisively reject Wisconsin’s request. Wisconsin’s proposal to create essentially a “for Wisconsin only” number and conservation policy could ultimately, and fatally, thwart FCC efforts to create a unified national framework for handling number conservation issues. Further, joint industry and FCC efforts to fully vest, on a nationwide basis, number management functions in the North American Numbering Plan Administrator (NANPA) could be derailed by

acceding to Wisconsin's request for effective day-to-day control over the State's numbering resource.

II. THE COMMISSION MUST NOT PREMATURELY LIMIT THE AGENCY'S ABILITY TO MAINTAIN FEDERAL CONTROL OVER A UNIFIED SYSTEM OF NUMBERING ADMINISTRATION

The Commission should not take any action at this time that will limit or restrict federal control over numbering administration. Grant of the Wisconsin petition, in whole or in part, would inevitably and ultimately detract from the Commission's ability to promulgate final rules in the *Number Resource Optimization (NRO)* proceeding that truly have nationwide applicability and effect.³ While the problems cited in the Wisconsin petition represent real concerns and may warrant an early response, the Commission must ensure that any action on the proposed number conservation methods in the instant petition does not limit its ability to promulgate nationwide numbering policies. In particular, an unconstrained state-by-state approach will threaten the integrity of the unified nature of the national telecommunications infrastructure, contrary to the intent of Congress when it amended the Communications Act in 1996.

In the 1996 Telecommunications Act, Congress gave the Commission "exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States."⁴ The Commission noted that Congress acted in this manner in recognition that "ensuring fair and impartial access to numbering resources is a critical component of encouraging a

³ *Numbering Resource Optimization et al.*, Notice of Proposed Rule Making, CC Docket No. 99-200, RM No. 9258, NSD File Nos. L-99-17 & 99-36 (released June 2, 1999) ("*NRO NPRM*").

⁴ 47 U.S.C. § 251(e)(1).

robustly competitive telecommunications market in the United States.”⁵ PCIA has consistently argued that the Commission should exercise this grant of jurisdiction because a national numbering policy is essential to the efficient provision of telecommunications service. PCIA has vigorously asserted in a host of recent FCC proceedings the need for a unified national framework.⁶ Against this background, the Commission should not take any action on the

⁵ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 11 FCC Rcd 19392, 19508 (1996) (“*Local Competition Second Report and Order*”), vacated in part sub nom. *California v. FCC*, 124 F.3d 934 (8th Cir. 1997), reversed in part sub nom., *AT&T Corp. v. Iowa Utilities Bd.*, 119 S. Ct. 721 (1999).

⁶ PCIA has already filed numerous comments addressing the merits of other state petitions seeking additional authority on numbering issues. See Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on California Public Utilities Commission Petition for Additional Authority to Implement Number Conservation Measures*, NSD File No. L-98-136, DA 99-928 (filed June 14, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on a Petition of the California Public Utilities Commission and the People of California for a Waiver to Implement a Technology-Specific or Service-Specific Area Code*, NSD File No. L-99-36, DA 99-929 (filed June 14, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on Florida Public Service Commission Petition for Additional Authority to Implement Number Conservation Measures*, NSD File No. L-99-33, DA 99-725 (filed May 14, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on Maine Public Utilities Commission Petition for Additional Authority to Implement Number Conservation Measures*, NSD File No. L-99-27, DA 99-638 (filed May 3, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on New York Department of Public Service Petition for Additional Authority to Implement Number Conservation Measures*, NSD File No. L-99-21, DA 99-462 (filed April 5, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on Massachusetts Department of Telecommunications and Energy’s Petition for Additional Authority to Implement Number Conservation Measures*, NSD File No. L-99-19, DA 99-461 (filed April 5, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on the Texas Public Utility Commission Petition for Delegation of Additional Authority to Implement Numbering Conservation Measures*, NSD File No. L-99-55 (filed August 16, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on The Connecticut Department of Utility Control’s Petition for Delegation of Additional Authority to Implement Area Code Conservation Measures*, NSD File No. L-99-62 (filed September 7, 1999).

In addition, PCIA filed further comments cautioning that premature grant of state relief inconsistent with uniform federal guidelines should be avoided. See Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on State Utility Commission Requests*
(Continued...)

Wisconsin petition that will limit its ability to promulgate nationwide policies that ensure unfettered, fair, and nondiscriminatory access to telephone numbers for all carriers.

The Commission should especially refrain from granting any element of additional authority sought by the Wisconsin petition during the pendency of the agency's effort in the *NRO* proceeding to craft comprehensive, nationwide solutions to number administration and conservation issues. PCIA urges the Commission to expeditiously and thoroughly consider the comments and reply comments submitted in the *NRO* proceeding before rendering a decision on the Wisconsin petition.⁷ Ideally, the FCC ought to arrive at decisions on the Wisconsin petition, as well as the other State petitions, only after the promulgation of a Report and Order in the *NRO* proceeding. In this manner, the Commission can best assure a nationwide consistency in numbering policy.

(...Continued)

for Additional Delegation of Additional Authority to Implement Telecommunications Numbering Conservation Measures, NSD File Nos. L-98-136, L-99-19, L-99-21, L-99-27 & L-99-33, DA 99-1198 (filed July 16, 1999).

Further, *see*, Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment on Massachusetts Department of Telecommunications and Energy Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781, and 978 Area Codes*, NSD File No. L-99-17, DA 99-460 (filed April 5, 1999); Comments of PCIA on Public Notice, *Common Carrier Bureau Seeks Comment On North American Numbering Council Letter Seeking Clarification of the Term 'Technology Neutral,'* DA 97-2234 (filed Oct. 29, 1997).

⁷ PCIA is an active participant in this major proceeding, filing Comments on July 30, 1999, and Reply Comments on August 30, 1999.

III. RAPID FCC ACTION ADDRESSING NUMBER UTILIZATION CRITERIA CAN MEET WISCONSIN'S CONCERNS WHILE MAINTAINING A UNIFORM NATIONAL NUMBERING REGIME

Should the FCC feel compelled to take action on the Wisconsin and/or other State petitions prior to conclusion of the *NRO* proceeding, PCIA believes there are a series of rapid steps that the Commission can implement during the pendency of the *NRO* proceeding that would help maintain a national numbering framework. Immediate FCC action should be taken to: (1) ensure the accuracy of information on which numbering decisions are based, (2) reclaim excess codes, and (3) employ "spot" audits beginning February 1, 2000.

These quicker alternative steps would alleviate many of the underlying circumstances prompting Wisconsin to seek additional relief, and would therefore permit the Commission to maintain a national approach to number resource optimization (which is required both as a matter of law and sound public policy) while addressing legitimate State concerns regarding NPA exhaust trends. As suggested by PCIA in a recent *ex parte* presentation to the Commission's Common Carrier Bureau, expeditious action as outlined below would meet State concerns while maintaining a national framework. PCIA urges the Commission to:

- ◆ Make effective immediately the mandatory reporting of information to the NANPA; and adoption of the Hybrid COCUS with LNP-capable carriers reporting at the thousand-block level.
- ◆ Adopt uniform definitions for reserve codes, available numbers, and other terminology so that reporting is consistent nationwide. Carriers should be required to begin reporting in this manner nationally starting in December 1999.
- ◆ Require carriers to return excess codes to NANPA by December 1, 1999.
- ◆ Grant the NANPA express authority to reclaim unused NXX codes and to deny codes to carriers who do not submit COCUS or who do not meet utilization thresholds.

- ◆ Announce that “spot” audits to judge compliance with the FCC’s rules may begin on February 1, 2000.

IV. WISCONSIN’S REQUEST TO ESTABLISH THOUSAND-BLOCK NUMBER POOLING SHOULD BE DENIED; ALTERNATIVELY WISCONSIN MUST CLARIFY THAT NON-LNP CARRIERS ARE EXEMPTED FROM THE REGIME

Wisconsin requests additional authority to implement its own mandatory thousand block number pooling requirements in advance of any federal promulgation of rules. The petition provides no details as to how Wisconsin would implement thousand block pooling, nor does it reveal any methods or procedures that might be employed in the months ahead to ultimately conform Wisconsin’s proposed pooling functionality to any national framework implemented by the Commission.⁸ While Wisconsin envisions minimizing differences between the Wisconsin pooling plan and a national pooling plan,⁹ no commitment to conformance is made. Certainly without a commitment to conform any pooling to national standards, the petition must be denied.¹⁰

It is crucial to note that only by inference does the Wisconsin petition limit its request for thousand-block pooling to carriers capable of operating in a local number portability (LNP) environment. The petition provides no indication that Wisconsin affirmatively recognizes that only carriers that are capable of porting numbers can provide services to their subscribers in a

⁸ PCIA recommends that the FCC’s staff closely review the Reply Comments filed by USTA in the *NRO* proceeding. The USTA pleading comprehensively addresses the crucial policy and technical reasons why national authority must be maintained over number pooling and other conservation efforts, and why various State petitions must be rejected. *See* USTA Reply Comments at 4-15.

⁹ Petition at 8-9.

¹⁰ PCIA urges the Commission to be mindful of the costs of pooling implementation to subject carriers, especially if the technical paradigms would change under the federal plan.

number-pooling environment in the same way as they can in a non-pooling environment.

Importantly, the Wisconsin petition fails to note that there a number of non-LNP capable carriers, including some landline and all CMRS carriers, that have until November 24, 2002 to implement LNP-capability, and thus are not capable of participating in pooling.¹¹ Likewise, the petition does not note that paging providers are exempted from participation in LNP, and hence cannot either contribute to or take numbers from a pool for the foreseeable future.

PCIA emphasizes that should the FCC decide to delegate pooling authority to Wisconsin, that the grant of additional authority must contain an explicit provision stating the FCC's determination that non-LNP capable carriers cannot be ordered to participate in any number pooling trial. Further, non-LNP capable carriers should not be required to participate in reporting requirements designed to identify thousand-block codes that can be made available for number pooling as that would impose additional expense on these carriers without any benefit.

The Wisconsin petition makes no mention of how non-LNP capable carriers would obtain numbers in a pooling environment. Alarming, the petition seeks authority to investigate and order NXX code rationing measures as a separate element unrelated to pooling mechanisms.¹² PCIA emphasizes that it is crucial that any future pooling be implemented on a technology-neutral basis, with non-LNP capable carriers having a real ability to obtain the numbering resources they need. To that end, should the Commission delegate pooling authority to Wisconsin, such grant must not include any rationing measure's that would preclude non-LNP

¹¹ PCIA also submits that Wisconsin's emphasis on thousand-block number pooling ignores the fact that with comparatively high utilization rates, the wireless industry has fewer numbers to contribute to any pool.

¹² Petition at 7-8.

capable carriers from receiving adequate numbering resources on a timely basis. Furthermore, if granted pooling authority, Wisconsin must be required to continue to implement new codes as necessary to assure that carriers receive thousand-blocks from the Wisconsin pooling administrator or full NXX codes from the Numbering Plan Administrator. It is crucial that non-LNP capable carriers continue to receive full NXX codes from the Numbering Plan Administrator when requested.

Further, PCIA urges the Commission to note that the multiplicity of rate centers in Wisconsin would serve to seriously undercut any gains that might be provided from thousand-block number pooling. Indeed, while Wisconsin aggressively pursues authority for measures best left in the federal domain, the petition demurs when it comes to the subject of rate center consolidation¹³ – the one method of number conservation squarely in the State’s domain, and the one most likely to provide the significant long-term number conservation benefits the State seeks, especially in to-be-established, or newly-established NPAs. Wisconsin notes that rate center consolidation requires consultation with industry, apparently on a relaxed schedule. PCIA offers that if Wisconsin were to take a more deliberative stance toward number pooling and the other requested measures best left in the federal domain for which it seeks authority, it would be able to reap the benefits flowing from a nationwide, uniform number conservation methodology implemented by the FCC as a result of the *NRO* proceeding. PCIA respectfully submits that if

¹³ The petition’s treatment of rate center consolidation is relegated to a footnote. (*See* Petition at 4.) Wisconsin’s reluctance to pursue rate center consolidation calls into question the efficacy of granting the State additional authority, such as pooling and other administrative procedures, when measures subject to State control, such as consolidation of rate center boundaries, which can provide demonstrable number conservation gains, have not been aggressively pursued.

the Commission considers granting any portion of the instant petition, that Wisconsin be ordered to undertake significant rate center consolidation on an accelerated basis.

V. WISCONSIN'S REQUEST TO IMPLEMENT ITS OWN ENFORCEMENT, CODE RECLAMATION, AND UTILIZATION/FORECAST AND AUDIT PROCEDURES MUST BE DENIED

Wisconsin seeks authority to enforce current number assignment standards, to set and enforce new ones, if necessary, and to enforce the reclamation of unused and reserved NXX codes. The petition also seeks State authority to order number utilization and forecast reporting, and to undertake audits of such reports. No particular enforcement standards, reclamation criteria, or audit methodologies are discussed or elaborated upon in the petition. PCIA emphasizes that grant of the petition by the Commission could invariably lead to 50 or more individual jurisdictions establishing their own definitions of number terminology, as well as auditing protocols.¹⁴

PCIA does not dispute the seriousness of Wisconsin's concerns with NPA exhaust. However, the lack of specificity provided now by Wisconsin, and uncertainty as to what enforcement, reclamation or audit criteria might be, underscores the importance of the FCC implementing uniform national numbering definitions and administrative criteria, and the need for these elements of the Wisconsin request to be denied.¹⁵ PCIA believes that the possibility of

¹⁴ The duplicative, conflicting nature of differing reporting requirements means that carriers often need to produce the requested information manually – taking hundreds of man-hours per request. A national format, with the same definitions throughout the country, would allow both comparable ease and improve the accuracy of reporting.

¹⁵ The North American Numbering Council (NANC) established an Issue Management Group (IMG) to make recommendations concerning administrative issues raised in Paragraph 38 of the *NRO NPRM*. The IMG's August 24, 1999 report to the NANC, which was accepted by the NANC, stated: "If independent State action is deemed permissible, . . .the use of one uniform set
(Continued...)

States establishing their own enforcement, reclamation and audit mechanisms, each employing different standards, is unacceptable.

In place of individual State procedures, PCIA advocates immediate FCC action to assure that data collection occurs within a national framework. In its Comments submitted in the *NRO* proceeding, PCIA states that the time has come for existing optional or advisory number utilization criteria and guidelines to become mandatory. Indeed, Wisconsin acknowledges that existing industry guidelines need to be strictly enforced.¹⁶ PCIA agrees, and urges the nationwide adoption of mandatory number optimization methods that enjoy widespread support and that can be easily implemented. These methods, which are fully outlined in Part III of this document, include immediate FCC adoption of the North American Numbering Council's endorsement of the Hybrid COCUS with semi-annual mandatory reporting. These measures must be adopted on an expedited basis, even prior to conclusion of the *NRO* proceeding. In this way, both the North American Numbering Plan Administrator (NANPA) and the States will gain more accurate information about number utilization trends. The adoption of measures will fulfill Wisconsin's need for full and accurate information and provide enforcement results that lead to the code reclamations the State seeks. Importantly, these results will occur through national processes implemented by federal and national mechanisms, sparing carriers from conformance with a multitude of jurisdictional rules enforced by a multitude of bodies.

(...Continued)
of audit procedures and criteria will eliminate duplicate audits, ensure audits are performed uniformly across all SPs and jurisdictions and be easily understood by SPs and Regulators alike.”

¹⁶ “However, much of the authority that the PSCW seeks merely involves strict enforcement of existing industry guidelines.” Petition at 4.

VI. WISCONSIN'S REQUEST TO REQUIRE UNASSIGNED NUMBER PORTING AND SEQUENTIAL NUMBER ASSIGNMENT AUTHORITY MUST BE DENIED

The petition seeks authority to impose unassigned number porting (UNP) and mandate that carriers employ sequential number assignment. Both these requests would have the State take on the function of a number administrator. Clearly, the NANPA, in its role as national administrator of the number resource, should be the only body permitted to explore and implement these number management techniques.

Notwithstanding the need for national control over numbering management issues, both these methods have serious disadvantages that limit their utility under any regulatory regime. UNP, for example, is a technique that is dependent upon the LNP capability of carriers and networks. By itself, UNP seems to encourage the “mining” of numbers, as one carrier can take another carrier’s desirable numbers without the other carrier’s consent. Second, UNP will punish those service providers who have efficiently managed their numbering resources, while those carriers who have not done so will be able to continue their mismanagement and still get telephone numbers, even in a jeopardy situation. Third, because the effectiveness of UNP is based directly on the number of service providers participating in it, if only a limited number of providers are able to take part in any given area, this method will only have a minimal impact on number exhaust.

Sequential number assignment is only well-suited for carriers with centralized number distribution procedures. For wireless carriers, who tend to operate widely geographically dispersed retail distribution networks, sequential number assignment may be impractical at best, and worst of all, frustrate the ability of wireless carriers to provide numbers to their subscribers. On its face, sequential number assignment is inherently discriminatory against any carrier with a

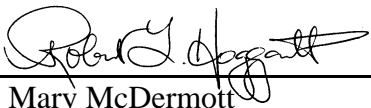
retail distribution network and the Commission should refuse to grant such authority to Wisconsin.

VII. CONCLUSION

PCIA respectfully urges the Commission not to take any actions in response to the petition of the Public Service Commission of Wisconsin that will limit the FCC's ability to promulgate pro-competitive, fair, and nondiscriminatory nationwide numbering policies in the context of the *NRO* proceeding. If additional authority is delegated, it must be done in a manner that does not jeopardize a national blueprint for number optimization.

Respectfully submitted,

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

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CERTIFICATE OF SERVICE

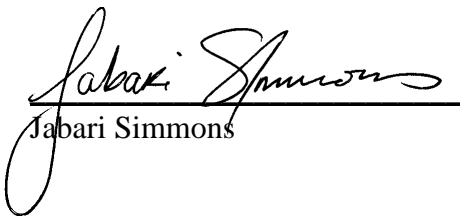
I, Jabari Simmons, do hereby certify that on this 13th day of September, 1999, a copy of the foregoing was served, by the method so described, to the parties listed below:

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